

REICHELLAW PC
MARK REICHEL
ATTORNEY AT LAW
State Bar #155034
455 CAPITOL MALL, SUITE 802
SACRAMENTO, CA 95814
916.548.7398
mark@reichellaw.com
www.reichellaw.com

Attorney for Defendant
JESUS VASQUEZ

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS LOUIS VASQUEZ,

Defendant

CASE NO. 2:23-cr-00095-JAM-1

**STIPULATION AND ORDER TO
CONTINUE FURTHER STATUS
CONFERENCE AND EXCLUDE TIME
UNDER SPEEDY TRIAL ACT**

Date: August 5, 2025

Time: 9:00 a.m.

Court: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its counsel of record, Special Assistant
United States Attorney Caily Nelson, and defendant, by and through its counsel of record,
Mark J. Reichel, hereby stipulate as follows:

STIPULATION AND ORDER

1. By stipulation, the defendant moves to continue the status conference to August 5, 2025, at 9:00 a.m., and to exclude time between June 17, 2025, and August 5, 2025, with an exclusion of time, under Local Code T4.
2. The parties agree and stipulate, and request that the Court find the following:
 - a. The discovery associated with this case includes hundreds of pages of reports, photos, and search warrant documents, as well as cellular phone downloads. All of this discovery has been produced directly to counsel and/or made available for inspection and copying.
 - b. Counsel for defendant desires additional time to review the discovery with his client, research and investigate possible defenses, discuss any potential resolution with his client, research mitigating evidence, and present it to the prosecution. Defendant is housed in Nevada City Jail, requires the services of an interpreter, and defense counsel and the defendant are very close to the adoption of a plea agreement to resolve the matter. A short continuance is needed.
 - c. Counsel for defendant believes that failure to grant the above requested continuance would deny him/her the reasonable time necessary for effective preparation, considering the exercise of due diligence.
 - d. The government does not object to the continuance.
 - e. Based on the above-mentioned findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f. For the purpose of computing time un the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of June 17, 2025 to August 5, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

3. Nothing in the stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate the additional time periods are excludable from the period within which a trial must commence.

Dated: June 12, 2025

MICHELE BECKWITH
Acting United States Attorney

Dated: June 12, 2025

/s/ CAILY NELSON
CAILY NELSON
Special Assistant United States
Attorney

Dated: June 12, 2025

/s/ MARK REICHEL
MARK REICHEL
Counsel for Defendant
JESUS VASQUEZ

STIPULATION AND ORDER

FINDINGS AND ORDER

The Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The June 17, 2025 further status conference is **VACATED** and **CONTINUED** to **August 05, 2025, at 9:00 a.m.** The Court also specifically finds that based on the facts set forth in the parties' stipulation, the failure to exclude the time between June 17, 2025, and August 5, 2025, would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court further finds that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. Time from June 17, 2025, to and including August 5, 2025, is excluded from the computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and Local Code T-4.

IT IS SO ORDERED.

Dated: June 13, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE

STIPULATION AND ORDER